

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF VIRGINIA

RICHMOND DIVISION

ROBERT DAVID STEELE, et al.,

Plaintiff,

vs.

JASON GOODMAN, et al.,

Defendant

Case No.: 3:17-cv-00601-MHL

DEFENDANT'S RESPONSE TO  
PLAINTIFF, ROBERT DAVID STEELE'S,  
FIRST REQUEST FOR PRODUCTION OF  
DOCUMENTS AND MOTION TO STAY  
DISCOVERY

**DEFENDANT'S RESPONSE TO PLAINTIFF, ROBERT DAVID STEELE'S,  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS AND MOTION TO STAY  
DISCOVERY**

Comes now Defendant Jason Goodman, Pro Se, with his response to Plaintiff's request for production of documents to move this court to stay discovery. The information Plaintiff requests would subject Defendant to undue annoyance, embarrassment, burden and expense without providing proportional value in resolving this matter. It is Defendant's belief that Plaintiff has endeavored to intentionally annoy, embarrass, harass and unduly burden Defendant while causing great expense of time, money and recourses not only for the Defendant, but also this honorable court. This request for document production is a furtherance of that effort.

The scope of Plaintiff's request is broad. If granted at all, it should be limited to matters of legitimate interest in resolving claims and requires a balancing of the probative value of the information sought with the burden placed upon the respondent. Defendant objects to Plaintiff's first request for discovery because it grossly violates this standard.

DEFENDANT'S RESPONSE TO PLAINTIFF, ROBERT DAVID STEELE'S, FIRST REQUEST FOR  
PRODUCTION OF DOCUMENTS AND MOTION TO STAY DISCOVERY - 1

1 I hereby attest that the pleadings herein are accurate and true under penalties of perjury.

2 Further, I hereby attest that the attached exhibits are accurate and true copies of source  
3 documents as described. Video and telephone recording transcripts may contain typos due to  
4 voice to text transcription software. True and accurate copies of original video and audio  
5 recordings can be provided should it please the court.  
6

7 Signed this 28 day of May 2019

8  
9 Defendant, Pro Se Jason Goodman

10  
11   
12

13 Jason Goodman, Pro Se  
14 252 7<sup>th</sup> Avenue Apt 6s  
15 New York, NY 10001  
16 [truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)  
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## BACKGROUND INFORMATION

Defendant Goodman has alleged a conspiracy between Plaintiff, Intervenor Applicant, co-Defendant Lutzke/Holmes and numerous third parties. This conspiracy is intended to disrupt, defund, defame, embarrass and otherwise frustrate the Defendant in an effort to chill Defendant's journalistic efforts. The conspiracy has been publicly acknowledged by Intervenor Applicant in a multiparty call, broadcast on YouTube as indicated by Defendant in previous pleadings (ECF No 78 EXHIBIT A). Any information gleaned from this instant legal action would almost assuredly be used to continue this effort.

Despite the entry of a default judgement against co-Defendant Susan Lutzke/Holmes in September of 2018, Plaintiff did nothing to prosecute this matter for more than six months. Only after D. George Sweigert began entering declarations and then attempting to intervene, did Plaintiff move to begin the Discovery process. The sheer number of motions and filings coming from both Plaintiff and Intervenor Applicant could be interpreted as intended to overwhelm Defendant in a compounded, cooperative, seemingly coordinated manner.

This instant lawsuit is an attempt to overwhelm Defendant, not with facts or valid claims of injury seeking relief, but rather lengthy pleadings based on false claims and false statements with no basis in fact or law and no evidence. The demand for production of documents will serve no benefit in resolving Plaintiff's false claims it is merely an intelligence gathering attempt by Plaintiff, intended to further Plaintiff's efforts to harass and intimidate the Defendant.

Plaintiff has failed to make a claim for which relief can be granted. Plaintiff will fail to prove defamation because he cannot prove Defendant made known false statements. In fact, Defendant remains consistent in his belief that the statements are true and correct. Plaintiff is a limited purpose public figure, certainly to the same extent Defendant is, having participated in

DEFENDANT'S RESPONSE TO PLAINTIFF, ROBERT DAVID STEELE'S, FIRST REQUEST FOR PRODUCTION OF DOCUMENTS AND MOTION TO STAY DISCOVERY - 3

1 many televised interviews and appearances around the world for several years prior to appearing  
2 on Defendant's broadcast.

3 Plaintiff has publicly lied, claiming the very discovery process in question had already  
4 provided him information that Defendant Goodman is paid \$3000 per month by Israeli Mossad.  
5 This specific claim has been repeated by Intervenor Applicant and other co-conspirators as  
6 pointed out in previous pleadings (ECF No 78 EXHIBIT I). This claim was made by Plaintiff in  
7 a video on YouTube that has since been removed but is paraphrased in a similar blog post by  
8 Plaintiff. (<https://ahtribune.com/culture-media/1992-deep-state-social-media.html>). In a blog  
9 post titled Live-Streamed Defamation, Plaintiff claims *"On 13 June I did a live-streamed*  
10 *interview with George Webb, whom I respect very much. He was being "handled" at the time by*  
11 *one Jason Goodman with Patricia Negron as his partner. In the course of that interview, [26] I*  
12 *raised the prospect of Goodman himself being handled – perhaps unwittingly – by the Mossad. I*  
13 *speculate now that legal discovery will reveal both monthly payments to Goodman on the order*  
14 *of \$3,000 a month, and a pattern of email and cellular contacts suggestive that Goodman has*  
15 *been taking direction, first toward undermining George Webb (who was getting too close to the*  
16 *truth about the Awan brothers being patsies for a Mossad operation via Debbie Wasserman*  
17 *Schultz, spying on and blackmailing Members of Congress) and then #UNRIG, Earth*  
18 *Intelligence Network, and me. [27]"*

19 In the absence of true factual information, Plaintiff has fabricated a ludicrous story in one  
20 of many malicious attempts to damage Defendant's worldwide reputation with false and  
21 outrageous accusations. There is little doubt that any information obtained through discovery  
22 would be used by Plaintiff to embarrass, harass, intimidate or otherwise harm Defendant further.

1 Plaintiff has brazenly requested privileged email communications with parties unrelated  
2 to this legal matter who are journalistic sources. These sources identities and communications  
3 with Defendant are protected by New York Civil Rights Law - CVR § 79-h. *Special provisions*  
4 *relating to persons employed by, or connected with, news media.*  
5

## 6 7 **RESPONSE TO REQUESTS FOR PRODUCTION OF DOCUMENTS**

- 8 1. Goodman objects to this request because Goodman does not have sufficient financial  
9 resources to pay the arbitrarily calculated absurdly high sum demanded by Plaintiff.  
10 Examination of Goodman's financial records would not only be unduly burdensome  
11 and oppressive it would not yield any useful evidence in resolving this matter.  
12
- 13 2. There are no documents to produce in response to this request because Defendant has  
14 not received any DONATIONS. This request further illustrates Plaintiff's inability to  
15 distinguish between a charitable donation and a payment to a for profit business.  
16 Defendant's news service provides video programming for its customers using a  
17 totally different business model than traditional broadcasts. Since its inception,  
18 broadcast news has been generally delivered to the end consumer, the viewer, at no  
19 cost, in exchange for spending some amount of time viewing advertisements paid for  
20 by multimillion-dollar sponsors of the broadcast. Defendant's for-profit business has  
21 done away with corporate sponsors by selling micro sponsorships directly to viewers.  
22 This approach eliminates the possibility of a single sponsor gaining financial  
23 influence or sway over the news reporting and is part of Defendant's brand strategy.  
24 Defendant's customers receive in kind for their payments, viewership of the video  
25 broadcasts.  
26  
27

1 3. Goodman objects to this request because it violates his First Amendment Rights.

2 Goodman is a pioneer on the cutting edge of crowdsourcing investigative journalism, a  
3 new technique that combines traditional investigative journalism with social media.  
4 Guests on Goodman's show are often whistleblowers exposing corruption, firsthand  
5 witnesses to crime and expert witnesses providing relevant testimony. In this new  
6 model of crowdsourced investigative journalism, the audience participates in the  
7 investigation and even provides a pool of witnesses and confidential sources. The  
8 Plaintiff's request to "identify members of the CSTT community" reveals their true  
9 goal. Plaintiff wants to expose the identities of individuals who provide leads,  
10 valuable evidence and first hand testimony so they too may be attacked, intimidated  
11 or harassed with lawsuits or other means. Intervenor Applicant has exhibited a  
12 pattern and practice of taking extra judicial measures to discourage guests from  
13 appearing on Goodman's show, most recently writing a letter to the Department of  
14 the Army after a retired Four-Star General appeared on the show to provide testimony  
15 contradicting Plaintiff's claims. **(EXHIBIT A)** This extra judicial action is both  
16 harassment of Defendant's associate and further circumstantial evidence of  
17 cooperation between Plaintiff and Intervenor Applicant in an effort to succeed jointly  
18 in this legal action. Plaintiff's request violates New York Civil Rights Law - CVR 79-  
19 h. Special provisions relating to persons employed by, or connected with, news  
20 media which protects Goodman's right to keep journalistic sources' identities secret.  
21

22 4. Defendant received no DONATIONS, therefore, there are no documents to produce  
23 in response to this request.  
24

1 5. Goodman objects to this request because it violates his First Amendment Rights and  
2 New York Civil Rights Law - CVR -§ 79-h. Special provisions relating to persons  
3 employed by, or connected with, news media which protects Goodman's right to  
4 keep journalistic sources' identities and communications secret.  
5

6 6. Goodman objects to this request because it violates his First Amendment Rights and  
7 New York Civil Rights Law - CVR -§ 79-h. Special provisions relating to persons  
8 employed by, or connected with, news media which protects Goodman's right to  
9 keep journalistic sources' identities and communications secret.  
10

11 7. Goodman objects to this request because it violates his First Amendment Rights and  
12 New York Civil Rights Law - CVR -§ 79-h. Special provisions relating to persons  
13 employed by, or connected with, news media which protects Goodman's right to  
14 keep journalistic sources' identities and communications secret.  
15

16 8. Goodman objects to this request because the Plaintiff has demonstrated that he  
17 already has copies of all the videos in question. This request reveals yet another  
18 attempt to unduly burden, oppress and cause expense for the Defendant without  
19 yielding any useful evidence in resolving this matter. The only conceivable purpose  
20 for making this request is to occupy Defendant with redundant busywork.  
21

22 9. Goodman objects to this request because Plaintiff already has copies of the videos  
23 and this request is written in a manner that serves to confuse. It is not clear what the  
24 difference is between complete copies and electronic copies, given that these videos  
25 originate in an electronic medium and live on-line. The Plaintiff's pleadings  
26 including lengthy quotes, screen captured photo exhibits and statements attesting to as  
27 much, indicate that Plaintiff has downloaded all of the videos in question. This  
28

1 means Plaintiff already has COMPLETE copies. DIGITAL ELECTRONIC copies  
2 are exact duplicates of the original data. This request reveals yet another attempt to  
3 unduly burden, oppress and cause expense for the Defendant without yielding any  
4 useful evidence in resolving this matter.  
5

6 10. Goodman objects to this request because it would unduly burden, oppress and cause  
7 expense for the Defendant without yielding any useful evidence in resolving this  
8 matter. Goodman also objects to this request because it violates his First Amendment  
9 Right to free speech and freedom of the press in its attempt to seek information about  
10 the identities of journalistic sources and their information.  
11

12 11. Goodman objects to this request because it violates his First Amendment Rights and  
13 New York Civil Rights Law - CVR  $\beta$  79-h. which protects Goodman's right to keep  
14 journalistic sources' identities and communications secret.  
15

16 12. Goodman objects to this request because it violates his First Amendment Rights and  
17 New York Civil Rights Law - CVR  $\beta$  79-h. which protects Goodman's right to keep  
18 journalistic sources' identities and communications secret.  
19

20 13. Goodman objects to this request because it violates his First Amendment Rights and  
21 New York Civil Rights Law - CVR  $\beta$  79-h. which protects Goodman's right to keep  
22 journalistic sources' identities and communications secret.  
23

24 14. Goodman objects to this request because it violates his First Amendment Rights and  
25 New York Civil Rights Law - CVR  $\beta$  79-h. which protects Goodman's right to keep  
26 journalistic sources' identities and communications secret.  
27



1 15. Goodman objects to this request because it violates his First Amendment Rights and  
2 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep  
3 journalistic sources' identities and communications secret.  
4

5 16. Goodman objects to this request because it violates his First Amendment Rights and  
6 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep  
7 journalistic sources' identities and communications secret.  
8

9 17. Goodman objects to this request because it violates his First Amendment Rights and  
10 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep  
11 journalistic sources' identities and communications secret.  
12

13 18. Goodman objects to this request because it violates his First Amendment Rights and  
14 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep  
15 journalistic sources' identities and communications secret.  
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17 19. Goodman objects to this request because it violates his First Amendment Rights and  
18 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep  
19 journalistic sources' identities and communications secret.  
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21 20. Goodman objects to this request because it violates his First Amendment Rights and  
22 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep  
23 journalistic sources' identities and communications secret.  
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25 21. Goodman objects to this request because it violates his First Amendment Rights and  
26 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep  
27 journalistic sources' identities and communications secret.  
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1 22. Goodman objects to this request because it violates his First Amendment Rights and  
2 New York Civil Rights Law - CVR  $\neg$ ß 79-h. which protects Goodman's right to keep  
3 journalistic sources' identities and communications secret.  
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5 23. Goodman objects to this request because it violates his First Amendment Rights and  
6 New York Civil Rights Law - CVR  $\neg$ ß 79-h. which protects Goodman's right to keep  
7 journalistic sources' identities and communications secret.  
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9 24. Goodman objects to this request because it violates his First Amendment Rights and  
10 New York Civil Rights Law - CVR  $\neg$ ß 79-h. which protects Goodman's right to keep  
11 journalistic sources' identities and communications secret.  
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13 25. Goodman objects to this request because it violates his First Amendment Rights and  
14 New York Civil Rights Law - CVR  $\neg$ ß 79-h. which protects Goodman's right to keep  
15 journalistic sources' identities and communications secret.  
16

17 26. Goodman objects to this request because it violates his First Amendment Rights and  
18 New York Civil Rights Law - CVR  $\neg$ ß 79-h. which protects Goodman's right to keep  
19 journalistic sources' identities and communications secret.  
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21 27. Goodman objects to this request because it violates his First Amendment Rights and  
22 New York Civil Rights Law - CVR  $\neg$ ß 79-h. which protects Goodman's right to keep  
23 journalistic sources' identities and communications secret.  
24

25 28. Goodman objects to this request because it violates his First Amendment Rights and  
26 New York Civil Rights Law - CVR  $\neg$ ß 79-h. which protects Goodman's right to keep  
27 journalistic sources' identities and communications secret.  
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1 29. Goodman objects to this request because it violates his First Amendment Rights and  
2 New York Civil Rights Law - CVR  $\neg$ ß 79-h. which protects Goodman's right to keep  
3 journalistic sources' identities and communications secret.

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5 30. Goodman objects to this request because it violates his First Amendment Rights and  
6 New York Civil Rights Law - CVR  $\neg$ ß 79-h. which protects Goodman's right to keep  
7 journalistic sources' identities and communications secret.

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9 31. Goodman objects to this request because it violates his First Amendment Rights and  
10 New York Civil Rights Law - CVR  $\neg$ ß 79-h. which protects Goodman's right to keep  
11 journalistic sources' identities and communications secret.

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13 32. Goodman objects to this request because it violates his First Amendment Rights and  
14 New York Civil Rights Law - CVR  $\neg$ ß 79-h. which protects Goodman's right to keep  
15 journalistic sources' identities and communications secret.

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17 33. Goodman objects to this request because it violates his First Amendment Rights and  
18 New York Civil Rights Law - CVR  $\neg$ ß 79-h. which protects Goodman's right to keep  
19 journalistic sources' identities and communications secret.

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21 34. Goodman objects to this request because it violates his First Amendment Rights and  
22 New York Civil Rights Law - CVR  $\neg$ ß 79-h. which protects Goodman's right to keep  
23 journalistic sources' identities and communications secret.

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25 35. Goodman objects to this request because it violates his First Amendment Rights and  
26 New York Civil Rights Law - CVR  $\neg$ ß 79-h. which protects Goodman's right to keep  
27 journalistic sources' identities and communications secret.

1 36. Goodman objects to this request because it violates his First Amendment Rights and  
2 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep  
3 journalistic sources' identities and communications secret.

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5 37. Goodman objects to this request because it violates his First Amendment Rights and  
6 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep  
7 journalistic sources' identities and communications secret.

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9 38. Goodman objects to this request because it violates his First Amendment Rights and  
10 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep  
11 journalistic sources' identities and communications secret.

12 39. Goodman objects to this request because it violates his First Amendment Rights and  
13 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep  
14 journalistic sources' identities and communications secret.

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16 40. Goodman objects to this request because it violates his First Amendment Rights and  
17 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep  
18 journalistic sources' identities and communications secret.

19  
20 41. Goodman objects to this request because it violates his First Amendment Rights and  
21 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep  
22 journalistic sources' identities and communications secret.

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24 42. Goodman objects to this request because it violates his First Amendment Rights and  
25 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep  
26 journalistic sources' identities and communications secret.

1 43. Goodman objects to this request because it violates his First Amendment Rights and  
2 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep  
3 journalistic sources' identities and communications secret.  
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5 44. Goodman objects to this request because it violates his First Amendment Rights and  
6 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep  
7 journalistic sources' identities and communications secret.  
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9 45. Goodman objects to this request because it violates his First Amendment Rights and  
10 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep  
11 journalistic sources' identities and communications secret.  
12

13 46. Goodman objects to this request because it violates his First Amendment Rights and  
14 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep  
15 journalistic sources' identities and communications secret.  
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17 47. Goodman objects to this request because it violates his First Amendment Rights and  
18 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep  
19 journalistic sources' identities and communications secret.  
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21 48. Goodman objects to this request because it violates his First Amendment Rights and  
22 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep  
23 journalistic sources' identities and communications secret.  
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25 49. Goodman objects to this request because it violates his First Amendment Rights and  
26 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep  
27 journalistic sources' identities and communications secret.  
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1 50. Goodman objects to this request because it violates his First Amendment Rights and  
2 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep  
3 journalistic sources' identities and communications secret.  
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5 51. Goodman objects to this request because it violates his First Amendment Rights and  
6 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep  
7 journalistic sources' identities and communications secret.  
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9 52. Goodman objects to this request because it violates his First Amendment Rights and  
10 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep  
11 journalistic sources' identities and communications secret.  
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13 53. Goodman objects to this request because it violates his First Amendment Rights and  
14 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep  
15 journalistic sources' identities and communications secret.  
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17 54. Goodman objects to this request because it violates his First Amendment Rights and  
18 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep  
19 journalistic sources' identities and communications secret.  
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21 55. Goodman objects to this request because it violates his First Amendment Rights and  
22 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep  
23 journalistic sources' identities and communications secret.  
24

25 56. Goodman objects to this request because it violates his First Amendment Rights and  
26 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep  
27 journalistic sources' identities and communications secret.  
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1 57. Goodman objects to this request because it violates his First Amendment Rights and  
2 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep  
3 journalistic sources' identities and communications secret.  
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5 58. Goodman objects to this request because it violates his First Amendment Rights and  
6 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep  
7 journalistic sources' identities and communications secret.  
8

9 59. Goodman objects to this request because it is based on false claims from an  
10 unidentified internet user and seeks irrelevant information that would serve no benefit  
11 in resolving Plaintiff's claims. This request for production stands out from all others.  
12 It is allegedly motivated by a public YouTube comment made by an unknown  
13 individual using an account named "queentut". This is an account name any person  
14 could select or obtain. YouTube presents no barriers in creating an account name or  
15 multiple account names, even if that name already exists and is used by another user.  
16 Any person could obtain the screen name "queentut" and could post any comment.  
17 The statements made in the unattributed comment are false and unsupported by  
18 evidence. The claims are insufficient to justify discovery of such irrelevant and  
19 personal information. Plaintiff is requesting discovery of alleged naked photographs  
20 of Defendant specifically displaying his penis. There is no conceivable explanation  
21 to describe how such information would help resolve Plaintiff's claims. More than  
22 any other single request, this speaks to Plaintiff's intention to obtain any information  
23 whatsoever that could be used to harass, intimidate, embarrass or damage  
24 Defendant's worldwide reputation.  
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28 60. See (EXHIBIT B)

1 61. Goodman objects to this request because it specifically seeks personal information  
2 about Goodman irrelevant to this matter intended to harass, intimidate, embarrass or  
3 damage Defendant's worldwide reputation and unduly burden Defendant and would  
4 not yield useful evidence in resolving this matter.  
5

6 62. [www.crowdsourcethetruth.org](http://www.crowdsourcethetruth.org), [www.crowdsourcethetruth.com](http://www.crowdsourcethetruth.com)

7 63. This is another request of particular interest. The now defunct YouTube channel  
8 titled "Crazy Dave's Insane-a-torium" was dedicated to archiving videos created by  
9 Intervenor Applicant D. George Sweigert. Sweigert regularly deletes his video posts,  
10 effectively spoliating evidence from the internet. When Crazy Dave's Insane-a-  
11 torium appeared, Intervenor Applicant moved swiftly to contact YouTube and  
12 remove this channel for allegedly violating his copyright. More likely these steps  
13 were taken to prevent the public from accessing evidence of Sweigert's ongoing  
14 harassment campaign against Defendant and in support of Plaintiff. There was no  
15 information about Plaintiff on Crazy Dave's Insane-a-torium making this a very  
16 curious request, particularly given ongoing allegations of a clandestine conspiracy  
17 between Plaintiff and Intervenor Applicant Sweigert. Goodman further objects to this  
18 request because it violates his First Amendment Right to free speech and freedom of  
19 the press. This violates New York Civil Rights Law - CVR § 79-h. Special  
20 provisions relating to persons employed by, or connected with, news media which  
21 protects Goodman's right to keep journalistic sources' identities and communications  
22 secret.  
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1 64. Goodman objects to this request because it violates his First Amendment Rights and  
2 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep  
3 journalistic sources' identities and communications secret.  
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5 65. Goodman objects to this request because it violates his First Amendment Rights and  
6 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep  
7 journalistic sources' identities and communications secret.  
8

9 66. Goodman objects to this request because it violates his First Amendment Rights and  
10 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep  
11 journalistic sources' identities and communications secret.  
12

13 67. Goodman objects to this request as it is fundamentally unreasonable to presume  
14 anyone could fulfill this. It would be virtually impossible to locate all tweets,  
15 retweets, replies, likes, shares, comments, posts, blogs, photographs, videos,  
16 messages or written content made by all the people using these services. This is an  
17 unfulfillable request.  
18

19 68. Goodman objects to this request as it is fundamentally unreasonable to presume  
20 anyone could fulfill this. It would be virtually impossible to locate all tweets,  
21 retweets, replies, likes, shares, comments, posts, blogs, photographs, videos,  
22 messages or written content made by all the people using these services. This is an  
23 unfulfillable request.  
24

25 69. Goodman objects to this request because it violates his First Amendment Rights and  
26 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep  
27 journalistic sources' identities and communications secret.  
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1 70. Goodman objects to this request because it violates his First Amendment Rights and  
2 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep  
3 journalistic sources' identities and communications secret.  
4

5 71. Goodman objects to this request because it appears to be a trick question intended to  
6 provoke a desired response to possibly be used against the defense. Goodman's  
7 belief that Plaintiff committed charity fraud was based on Goodman's understanding  
8 of the statutes related to operation of a 501c3 non-profit charitable corporations in  
9 New York State as well as statements made and actions taken by Plaintiff in pursuit  
10 of charitable donations. At no time prior to initiating this legal action did Plaintiff  
11 take steps to clarify or provide expert testimony, letters demanding retraction or  
12 providing supportive evidence to clarify the understanding of New York State statutes  
13 related to the operation of a 501c3. Defendant's documents have already been  
14 submitted in this ongoing legal matter; therefore, this is another request for  
15 production of redundant material intended to waste Defendant's time and resources,  
16 or otherwise cause the Defendant to make statements Plaintiff might twist to  
17 Plaintiff's advantage.  
18

19 72. Goodman objects to this request because it appears to be a trick question intended  
20 to provoke a desired response or statement. The statement made in ECF 44 was made  
21 on information and belief and the support for that belief is outlined in ECF 44. This  
22 request is further evidence of Plaintiff's desire to request irrelevant information that  
23 would not yield any useful evidence in resolving this matter  
24

25 73. Goodman objects to this request because Goodman's specific allegation is that  
26 Plaintiff, Intervenor Applicant and co-conspirators communicate using clandestine  
27

1 methods akin to those used by CIA and Military Intelligence, with the specific intent  
2 to hide evidence of such communication and defy civil legal procedures including  
3 discovery. Good evidence of this cooperation can be seen in the common goals of the  
4 individuals named and even in many of Plaintiff's requests for Production of  
5 information that would only be useful to Intervenor Applicant. It is Defendant's  
6 belief that Plaintiff's request is specifically intended to deceive or otherwise provoke  
7 a statement from Defendant that would be used to discredit the allegation of  
8 conspiracy.  
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11 74. Goodman objects to this request because it violates his First Amendment Rights and  
12 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep  
13 journalistic sources' identities and communications secret.

14 75. Goodman objects to this request because it does not make sense and appears to be  
15 impossible to fulfill.  
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## CONCLUSION

Plaintiff's litany of false statements has enabled this fundamentally fraudulent lawsuit. It is Defendant's belief that this lawsuit and the Discovery process in question are intended to harass, intimidate and unduly burden Defendant while destroying Defendant's worldwide reputation. The information requested for production is remarkably broad and consistently unrelated to claims made by Plaintiff in the Amended Complaint. Requests for discovery of communications with talk show guests, confidential sources and virtually anyone of significance who has appeared on Goodman's show, reveal Plaintiff's apparent motive, to learn everything about anyone Defendant has communicated with and possibly expose those communications, destroying Defendant's worldwide reputation as a journalist. The Supreme Court has long mandated that trial courts should resolve civil matters fairly but without undue cost. *Brown Shoe Co. v. United States*, 370 U.S. 294, 306 (1962). This directive is echoed by the Federal Rules of Civil Procedure Rule 26(b)(2)(C), under which the court, "on its own, must" limit the frequency and extent of discovery if the discovery sought is "unreasonably cumulative or duplicative," can be "obtained from some other source that is more convenient, less burdensome, or less expensive,"

For this and the above stated reasons, Defendant respectfully requests the court stay discovery in this matter. Respectfully submitted,



Jason Goodman, Pro Se  
252 7<sup>th</sup> Avenue Apt 6s  
New York, NY 10001

[truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)

**(EXHIBIT A)**

**D. George Sweigert, c/o  
P.O. Box 152  
Mesa, AZ 85211**

**May 16, 2019**

**Hon. Mark Esper  
Secretary of the Army  
Office of the Secretary of the Army  
101 Army Pentagon  
Washington, DC 20310-0101**

**REF: Inappropriate access to sensitive unclassified information by retired General  
William F. Kernan**

Good Morning,

1. As you are well aware, the referenced military member has been allegedly making inappropriate contacts to a military organization on behalf of the individual that closed the Port of Charleston, S.C. due to a dirty bomb hoax on June 14, 2017. A video confession is referenced below.

2. This military member began corresponding with an individual known as "Queen Tut" aka Susan Holmes of Fort Collins, Colorado. Ms. Holmes is infamously known for holding a "KILL ALL POLICE" sign at a protest at the Colorado State University (see below). Her side-kick, Jason D. Goodman (DOB April 7, 1970), has widely disseminated a telephone call with this military member, in which he states he made inquiries to SACLANT on behalf of "Queen Tut" and Mr. Goodman. Mr. Goodman is widely attributed as the individual that closed the Port of Charleston.

Warm regards,

  
D. Sweigert

**Copies provided:**

**Commanding General  
U.S. Army Criminal  
Investigative Command  
27130 Telegraph Road,  
Quantico, VA 22134-2253**

**Sir Ian Forbes, ADM  
Commander In Chief (CINC)  
SACLANT  
7857 Blandy Road,  
Suite 100  
Norfolk, Virginia 23551-2490**

**Chief of Police  
Colorado State  
University  
Green Hall  
Fort Collins, CO 80521**

**Susan Homes,  
aka Susan A. Lutzke  
2608 Leisure Drive  
Apt. B  
Fort Collins, CO 80525**

**Jason Goodman  
252 7th Avenue  
Suite 6-S  
New York, NY 10001**

**Sector Commander,  
Capt. Jason Tama,  
USCG  
USCG Sector New York  
212 Coast Guard Drive  
Staten Island, N.Y. 10305**

## Evidence

Internet URL: <https://money.cnn.com/2017/06/16/media/port-of-charleston-dirty-bomb-conspiracy-theory-shutdown/index.html>



# How a conspiracy theory closed part of a major US seaport

by Donie O'Sullivan @CNNMoney

June 16, 2017 5:46 PM ET



The past few years have shown how our propensity to speculate and to share online can quickly transform a fringe thought into conventional thinking. On Wednesday, we got new evidence of the

**RELIABLE SOURCES**  
Brian Stelter's must-read media newsletter  
[Click to subscribe >](#)

**Photos**  
[Photos] Al Macgregor Is Almost 80, Try Not To Smile When You...  
[Photos] 25 Failed



Webb posts daily on his own, separate YouTube channel, hosting a series he calls "Hillary's Leakers, Hackers and Henchmen." His videos rarely get more than 10,000 YouTube views.



An In  
Until

After Webb mentioned the "Memphis Maersk," the audience quickly sprung into collective action through a "Crowdsource the Truth" Facebook group and the live comments section that accompanied the YouTube broadcast.

Trans  
Monti

Using a free online tracking tool, viewers found that the ship was in or approaching the Port of Charleston in South Carolina.

The 1  
Card:

About an hour later, Webb's onscreen counterpart, Jason Goodman, who runs "Crowdsource the Truth," called a number he said was the Coast Guard while still live streaming.



Goodman identified himself to the person on the other end of the line as a "reporter with an independent news agency," and began telling them about the alleged threat before he was interrupted.



"Is this the 'dirty bomb?'" the person asked — someone had already called it in — perhaps someone watching the live stream.

Internet URL: <https://www.youtube.com/watch?v=aUeNLLWikiM&t=14s>



### Retired US Army Four Star General William F. Kernan Destroys Robert David Steele's Ridiculous Claims

Jason Goodman

✓ Subscribed 81K

8,031 views

+ Add to Share ... More

16 345 22

Streamed live on May 1, 2019

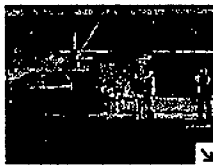
Robert David Steele has boasted of "writing 85%" of the NATO Open Source Intelligence Handbook. However, the retired Four Star U.S. Army General who oversaw the project at SACLANC says Robert David Steele's claim is not only false, but ridiculous.

ENCLOSURE

Internet URL: <https://www.coloradoan.com/story/news/2018/12/22/mother-man-fatally-shot-fort-collins-csu-police-files-complaint-complete-body-cam-footage/2391338002/>

## Mother of man killed by police files court complaint for unredacted body camera footage

Seja Hindi, Fort Collins Coloradoan Published 12:44 p.m. MT Dec. 22, 2018 | Updated 12:56 p.m. MT Dec. 23, 2018



(Photo: Cassa Hedringhaus/The Coloradoan, Cassa Hedringhaus/The Coloradoan)



The mother of a man fatally shot by police last year filed a complaint in district court this month asking Colorado State University to release unredacted footage of her son's shooting.

An attorney filed the civil action for Susan Holmes. Her 19-year-old son, Jeremy, was shot by a Fort Collins police officer and a Colorado State University police officer during a confrontation on July 1, 2017.

Susan Holmes had called police dispatch to report that Jeremy, who she said was having a psychotic reaction to THC from marijuana, had left the house with a knife and had threatened to kill his brother. She couldn't reach her other son or his wife by phone and asked for police to be dispatched to where they lived about two miles away and tell them not to answer the door.

A CSU police officer, Katie Aron, responded to the apartment, since it was located on campus, but another CSU officer, Corporal Phil Morris, made contact with Jeremy Holmes nearby between Center Avenue and Whitcomb Street.

ADVERTISEMENT



1 killed in plane crash near airport in Loveland

May 15, 2019, 9:11 p.m.

General:

Thank you very much for your efforts in resolving this issue. I really appreciate it. Your information will save a lot of people from supporting a fraud being perpetuated by Robert David Steele.

Sincerely,  
QUEENTUT

21 Aug 2017 18:29 by GENERALKERNAN@XXXXXXXXXX.com

QUEENTUT:

I have checked several sources and Robert David Steele never worked for us at NATO or JFCOM when we published this handbook. This handbook was a product of SACLANC Strategy and Plans and championed by a Dutch Rear Admiral. This was definitely a staff effort.

I have no idea why this individual would list this as one of his publications when it is clearly a NATO publication.

Hope this is helpful.

Buck Kernan

In a message dated 8/17/2017 6:49:25 PM Eastern Standard Time, QUEENTUT@XXXXXXXXXX.com writes:

Hi General Kernan:

This is QUEENTUT here:

**(EXHIBIT B)**

**Jason Goodman**

Director, Cinematographer, Stereographer  
252 7th Avenue New York, NY 10001 212-844-9830

**Education 1990–1994**

Graduated NYU Tisch School of the Arts BFA Film and Television Production

**Work Experience**

*Carolco Pictures 2014–2016 (Executive Board Member)*

Charter member of the Board of Directors of the newly restored multibillion dollar brand.

*AeroCine, INC 2013–2014 (CEO)*

Founding member of this UAS cinematography company. First in the world to conduct 3D RED UAV flight.

*21st Century 3D 1999–present (Founder and CEO)*

Founded the first digital stereoscopic live action production company in New York City. Developed cutting edge stereoscopic camera systems. Expanded to offices in both New York and Los Angeles in 2009.

*Multimedia System Design 1993–1999 (Founder and CEO)*

IT support company catering to video editors, graphic arts and musicians. Deployed and maintained networks for many ad agencies and video production facilities.

*Crest Films 1991–1993 (IT Administrator)*

Worked directly with filmmaker / CEO Pierre DeLespinois deploying and managing computer systems and networks for the emerging digital production environment at this innovative, technology centric film production company.

**Production Credits**

*Director*

1. Fantasma VR (2016) 3D 360° tour of NYC's Houdini Museum of Magic
2. Daydreams of Dubai (2014) 3D Filmmation (ride film for UAE) (Writer/Director/DoP)
3. Vancercil VR (1997) Cutting edge virtual experience created for Wyeth Pharmaceuticals

*Cinematographer*

1. Houston Rockets VR experience 3D (2017) (director of photography/stereographer)
2. Marriott / Oculus VR experience 3D (2014) (director of photography/stereographer)
3. Skyhigh Scrapers 3D (2013) Discovery UK (director of photography/stereographer)
4. Sully Erna: Avalon Live (2012) (director of photography/stereographer)
5. Slightly Stoopid & Fishbone Live (2011) (director of photography/stereographer)
6. Hillbilly Blood (2011) (TV series) 3net (director of photography/stereographer)
7. Julia X (2010) (director of photography/stereographer)

*Camera and Electrical Department*

1. X-Men: Days of Future Past (2014) (stereographer: VFX elements unit)
2. Metallica Through the Never (2013) (stereographer: NY unit / Post Stereo Supervisor)
3. The Amazing Spider-Man (2012) (stereographer: second unit)
4. Air Racers IMAX 3D (2012) (stereographer)
4. I (Almost) Got Away With It (2011) (stereographer – 1 episode)
5. Kenny Chesney: Summer in 3D (2010) (second unit stereographer)
6. Planet You 3D (2009) (stereographer)
7. Call of the Wild (2009) (stereographer)

**Circuit Court for** Eastern Division Virginia

**Case No.** 3:17-cv-601-MHL

**City or County**

Robert David Steele and Earth Intelligence Networ

Jason Goodman

**Name**

**Name**

11005 LANGTON ARMS CT

252 7th avenue

6s

**VS.**

**Street Address**

**Apt. #**

**Street Address**

**Apt. #**

OAKTON, VA 22124 ( 571 ) 320-8573

New York NY 10001 ( 323 ) 744-7594

**City State Zip Code Area Telephone**

**City State Zip Code Area Telephone**

**Plaintiff**

**Defendant**

## CERTIFICATE OF SERVICE

(DOMREL58)

I HEREBY CERTIFY that on this 28 day of May, 2019, a copy

of the document(s) entitled DEFENDANT'S RESPONSE TO PLAINTIFF, ROBERT DAVID STEELE'S, FIRST REQUEST FOR PRODUCTION OF DOCUMENTS AND MOTION TO STAY DISCOVERY

**Title of Document(s)**

was/were mailed, postage prepaid to:

D. George Sweigert

**Opposing Party or His/Her Attorney**

PO Box 152

**Address**

**City** Mesa

**State** AZ

**Zip** 85211

May 28, 2019

**Date**

**Signature**



<b>Circuit Court for</b> <u>Eastern Division Virginia</u>		<b>Case No.</b> <u>3:17-cv-601-MHL</u>	
<b>City or County</b>			
<u>Robert David Steele and Earth Intelligence Networ</u>		<u>Jason Goodman</u>	
<b>Name</b>		<b>Name</b>	
<u>11005 LANGTON ARMS CT</u>		<u>252 7th avenue</u>	
<b>Street Address</b>		<b>Street Address</b>	
<u>OAKTON, VA 22124 ( 571 ) 320-8573</u>		<u>New York NY 10001 ( 323 ) 744-7594</u>	
<b>City</b>	<b>State</b>	<b>City</b>	<b>State</b>
<b>Zip Code</b>	<b>Area Code</b>	<b>Zip Code</b>	<b>Area Code</b>
<b>Telephone</b>		<b>Telephone</b>	
<b>Plaintiff</b>		<b>Defendant</b>	

**CERTIFICATE OF SERVICE**  
(DOMREL58)

I HEREBY CERTIFY that on this 28 day of May, 2019, a copy  
of the document(s) entitled DEFENDANT'S RESPONSE TO PLAINTIFF, ROBERT DAVID STEELE'S,  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS AND MOTION TO STAY  
DISCOVERY

Title of Document(s)  
was/were mailed, postage prepaid to:

Susan Lutzke Holmes  
**Opposing Party or His/Her Attorney**  
2608 Leisure Dr Unit B  
**Address**  
Fort Collins CO 80525  
**City** **State** **Zip**

May 28, 2019  
**Date**

  
**Signature**



**Circuit Court for** Eastern Division Virginia**Case No.** 3:17-cv-601-MHL**City or County**

Robert David Steele and Earth Intelligence Networ

Jason Goodman

**Name****Name**

11005 LANGTON ARMS CT

252 7th avenue

6s

**VS.****Street Address****Street Address****Apt. #**

OAKTON, VA 22124 ( 571 ) 320-8573

New York NY 10001 ( 323 ) 744-7594

City State Zip Code Area Code Telephone

City State Zip Code Area Code Telephone

*Plaintiff**Defendant***CERTIFICATE OF SERVICE****(DOMREL58)**

I HEREBY CERTIFY that on this 28 day of May, 2019, a copy  
of the document(s) entitled DEFENDANT'S RESPONSE TO PLAINTIFF, ROBERT DAVID STEELE'S,  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS AND MOTION TO STAY  
DISCOVERY

**Title of Document(s)**  
was/were mailed, postage prepaid to:

Terry Frank Kaufman &amp; Canoles

**Opposing Party or His/Her Attorney**

1021 E. Cary Street, 14th Floor

**Address**City Richmond VA State 23219 Zip

May 28, 2019  
Date

  
Signature

**Circuit Court for** Eastern Division Virginia

**Case No.** 3:17-cv-601-MHL

**City or County**

Robert David Steele and Earth Intelligence Networ

Jason Goodman

**Name**

**Name**

11005 LANGTON ARMS CT

252 7th avenue

6s

**VS.**

**Street Address**

**Street Address**

**Apt. #**

OAKTON, VA 22124 ( 571 ) 320-8573

New York NY 10001 (323 ) 744-7594

**City State Zip Code Area Telephone**  
**Code**

**City State Zip Code Area Telephone**  
**Code**

**Plaintiff**

**Defendant**

## **CERTIFICATE OF SERVICE**

**(DOMREL58)**

I HEREBY CERTIFY that on this 28 day of May, 2019, a copy  
of the document(s) entitled DEFENDANT'S RESPONSE TO PLAINTIFF, ROBERT DAVID STEELE'S,  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS AND MOTION TO STAY  
DISCOVERY

**Title of Document(s)**  
was/were mailed, postage prepaid to:

Steven S Biss

**Opposing Party or His/Her Attorney**


300 West Main Street Suite 102

**Address**

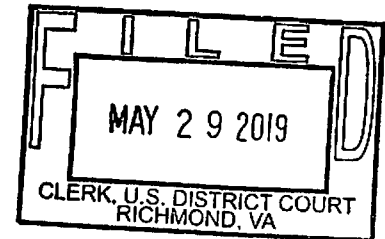
**City State Zip**  
Charlottesville VA 22903

May 28, 2019  
**Date**

**Signature**



UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
DIVISION



ROBERT DAVID STEELE, et al.,

Plaintiff(s),

v.

Civil Action Number: 3:17-cv-00601-MHL

JASON GOODMAN, et al.,

Defendant(s).

LOCAL RULE 83.1(M) CERTIFICATION

I declare under penalty of perjury that:

No attorney has prepared, or assisted in the preparation of

DEFENDANT'S RESPONSE TO PLAINTIFF,  
ROBERT DAVID STEELE'S,  
FIRST REQUEST FOR PRODUCTION OF  
DOCUMENTS AND MOTION TO STAY  
DISCOVERY

JASON GOODMAN

Name of *Pro Se* Party (Print or Type)

  
Signature of *Pro Se* Party

Executed on: May 28, 2019 (Date)

OR

The following attorney(s) prepared or assisted me in preparation of \_\_\_\_\_.  
(Title of Document)

\_\_\_\_\_  
(Name of Attorney)

\_\_\_\_\_  
(Address of Attorney)

\_\_\_\_\_  
(Telephone Number of Attorney)

Prepared, or assisted in the preparation of, this document

\_\_\_\_\_  
(Name of *Pro Se* Party (Print or Type)

\_\_\_\_\_  
Signature of *Pro Se* Party

Executed on: \_\_\_\_\_ (Date)